

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NEW YORK

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BLACK LOVE RESISTS IN THE RUST, et al.,	:	
	:	
Plaintiffs,	:	Case No. 1:18-cv-00719-CCR
	:	
v.	:	
	:	
CITY OF BUFFALO, N.Y., et al.,	:	
	:	
Defendants.	:	
	:	
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**PLAINTIFF BLACK LOVE RESISTS' FIRST SET OF INTERROGATORIES  
TO DEFENDANT CITY OF BUFFALO, N.Y.**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Black Love Resists in the Rust ("Plaintiff"), by its undersigned attorneys, hereby request that, within thirty (30) days, or on a date mutually agreed to by the parties, each defendant answer the interrogatories in Schedule B ("Interrogatories"), in accordance with the definitions and instructions set forth in Schedule A. Plaintiff reserves the right to serve additional Interrogatories as discovery progresses.

Dated: November 5, 2018

/s/ Claudia Wilner  
 Marc Cohan  
 Travis W. England  
 Claudia Wilner  
 Britney Wilson  
 NATIONAL CENTER FOR LAW  
 AND ECONOMIC JUSTICE  
 275 Seventh Avenue, Suite 1506  
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 212-633-6967

3. The term “BPD” means the Buffalo Police Department, including its officers, supervisors, commanders, captains, chiefs, units, departments, divisions, districts, bureaus, task forces, squads, sections, employees, and agents.

4. The term “Checkpoint” means any vehicle checkpoint planned, authorized, supervised, or conducted by the BPD.

5. The term “Division of Traffic Enforcement” means the Division of Traffic Enforcement of the BPD, including its officers, supervisors, commanders, captains, chiefs, units, departments, divisions, districts, bureaus, task forces, squads, sections, employees, and agents.

6. The term “Employment History” means a person’s date of hire; the names and dates of all positions held; the date and basis of any discipline received; the date and basis of their separation (where applicable); the date and basis of their termination (where applicable).

7. The term “Housing Unit” means the Housing Unit of the BPD, including its officers, supervisors, commanders, captains, chiefs, units, departments, divisions, districts, bureaus, task forces, squads, sections, employees, and agents.

8. The term “Location” means the address, street segment, and/or intersection and includes the greatest level of detail for which the information is available.

9. The term “Strike Force” means the Strike Force Unit of the BPD, including its officers, supervisors, commanders, captains, chiefs, units, departments, divisions, districts, bureaus, task forces, squads, sections, employees, and agents.

10. The term “You” or “Your” means Defendant City of Buffalo, N.Y. and any Person or entity acting on its behalf or under its control, including, but not limited to, the Buffalo Police Department, the Buffalo Traffic Violations Agency, any of their respective predecessors